

**DUBLIN
CIVIC
TRUST**

*A company limited
by guarantee with charitable
status for the purpose of
residential renewal,
cultural enhancement
& maintenance of
the historic fabric
of the city*

RE: Draft Greater Dublin Area Transport Strategy

10th January 2021

Dear Sir/Madam,

Dublin Civic Trust welcomes the publication of the Draft Greater Dublin Area Transport Strategy by the NTA and the enshrined core principles of sustainability and creating walkable, cyclable communities as a priority.

We wish to make the core point that the vital and finite resource of built heritage and the various statutory protections afforded to it under Part IV of the Planning & Development Act – including Protected Structure and Architectural Conservation Area (ACA) designations - does not feature anywhere in the Strategy other than under EIS considerations. This is not in line with wider Government policy.

Built heritage protection and enhancement are objectives of Government strategies including Project Ireland 2040, Heritage Ireland 2030, the Town Centre First Strategy as well as a variety of guidance documents such as *Architectural Heritage Protection Guidelines for Planning Authorities*. These policies provide a framework around investment in and works to public realm and to public and private property of built heritage significance and character areas. This includes historic streets and squares, parks and landscapes, street and road surfaces, historic transport infrastructure etc.

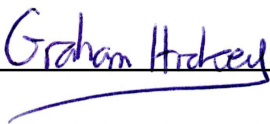
It must be a key aim of the Strategy to protect and enhance built and architectural heritage, most notably in the public realm section where placemaking, maintaining and creating townscape and urban character are core aims.

The Trust highlights to the NTA a number of recent transport infrastructure failings related to built heritage through the omission of heritage requirements as part of core design strategies. These include the deleterious impact of poles and wirescapes for the Luas Cross City project through the ceremonial core of Dublin, notably College Green, Westmoreland Street, O'Connell Bridge and encircling Parnell Monument, the loss of historic street surfaces at key junctions of the same project, and the design fiasco surrounding the Luas station wall at Broadstone station which remains as a permanent legacy of the absence of historic urban design consideration in a major transport project.

All future transport investment in the Greater Dublin Area must involve built heritage and conservation expertise as part of planning and early design phases. This includes mode and route planning, as well as developmental planning of streetscape, historic buildings and wider established/historic character areas. The contribution that built heritage makes to townscape, placemaking and sustaining community identity also requires iteration in the final document.

We trust our views will be taken into consideration in the final formulation of this worthwhile and much-anticipated Strategy.

Yours sincerely,



Graham Hickey
Conservation Director
Dublin Civic Trust